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October 15, 2018

**Via SCPSC E-FILING DMS**

The Honorable Jocelyn G. Boyd  
Chief Clerk/Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive  
Columbia, SC 29210

**Re: Application of Duke Energy Progress, LLC for Approval of Rider 10,  
Demand-Side Management and Energy Efficiency  
Docket No. 2018-255-E**

Dear Ms. Boyd:

Walmart Inc. ("Walmart") timely filed a Petition to Intervene in this case on September 17, 2018, which was granted by South Carolina Public Service Commission ("Commission") Directive Order issued on October 3, 2018. By way of this letter, Walmart provides limited Comments (due on this date per the Commission Directive issued September 17, 2014, Docket No. 2013-92-A, Order No. 2014-766).


Walmart has reviewed the Duke Energy Progress, LLC's ("DEP" or "Company") filing and supporting documentation, and has no objection to DEP's proposed changes. Walmart also notes that DEP proposes to maintain, without change, the "opt-out" provisions of Rider DSM/EE. Walmart strongly supports DEP's opt-out provisions in light of Walmart's extensive, self-funded energy efficiency ("EE")/demand-side management ("DSM") efforts. Walmart notes (as it did in Case No. 2018-72-E) that it would appreciate engaging DEP and Duke Energy Carolinas ("DEC") in a discussion to address making DEC's opt-out procedures (DEC Rider EE(SC), page 2 of 2) consistent with DEP's. Walmart therefore re-affirms its willingness and desire to work cooperatively with DEP, DEC, and the Office of Regulatory Staff to evaluate harmonizing the DEP and DEC opt-out processes in the future.

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By copy of this letter, I am serving all parties of record via Electronic Mail and/or First-Class Mail. Please contact us if you have any questions concerning this filing.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

By   
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SUE/sds  
Attachment  
c: Certificate of Service

STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION  
DOCKET NO. 2018-255-E

IN RE: Application of Duke Energy Progress     )  
LLC for Approval of Rider 10, Demand-Side     )  
Management and Energy Efficiency             )

**CERTIFICATE OF SERVICE**

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I hereby certify that I have this day served one (1) copy of the foregoing document upon the following parties to this proceeding via Electronic Mail and First Class Mail:

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Dated: October 15, 2018